

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO,

PROMESA
Title III

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,¹

No. 17 BK 3283-LTS
(Jointly Administered)

Debtors.

**ELEVENTH SUPPLEMENTAL VERIFIED STATEMENT OF
THE QTCB NOTEHOLDER GROUP PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to this Title III case by Section 310 of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), 48 U.S.C. § 2170, and in accordance with the *Order Further Amending Case Management Procedures* [ECF No. 15894] (the “Order”), this eleventh supplemental verified statement (the “Eleventh Supplemental Statement”) is hereby submitted by an ad hoc group of holders (the “QTCB Noteholder Group”)² of those certain Qualified School Construction Bonds and Qualified Zone Academy Bonds issued by the Puerto

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The QTCB Noteholder Group has the same meaning as set forth in *Notice of Appearance and Request for Notice* [ECF No. 134].

Rico Public Buildings Authority and guaranteed by the Commonwealth of Puerto Rico (the “Commonwealth”) (collectively, the “QTCBs” and, together with all other bonds issued or guaranteed by the Commonwealth the “General Obligation Bonds”). In support of this Eleventh Supplemental Statement, the QTCB Noteholder Group respectfully states as follows:

1. On August 16, 2017, the QTCB Noteholder Group submitted the *Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF No. 1053]. On August 14, 2018, the QTCB Noteholder Group submitted the *Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF No. 3765], corrected, *see Corrected Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF No. 3778].

2. On January 18, 2019, the QTCB Noteholder Group submitted the *Second Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF No. 4871].

3. On June 26, 2019, the QTCB Noteholder Group submitted the *Third Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF No. 7659].

4. On September 5, 2019, the QTCB Noteholder Group submitted the *Fourth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant Bankruptcy Rule 2019* [ECF No. 8618].

5. On February 19, 2020, the QTCB Noteholder Group submitted the *Fifth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant Bankruptcy Rule 2019* [ECF No. 11293].

6. On July 3, 2020, the QTCB Noteholder Group submitted its *Sixth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF No. 13548].

7. On October 20, 2020, the QTCB Noteholder Group submitted its *Seventh Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF No. 14708].

8. On March 6, 2021, the QTCB Noteholder Group submitted its *Eighth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF. No. 15968].

9. On April 15, 2021, the QTCB Noteholder Group submitted its *Ninth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF. No. 16445].

10. On July 10, 2021, the QTCB Noteholder Group submitted its *Tenth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* [ECF. No. 17296].

11. In accordance with Bankruptcy Rule 2019 and the Order, as set forth in **Exhibit A**, is a list of the names, addresses of each member of the QTCB Noteholder Group—and each such member’s disclosable economic interests in each of the Title III Debtors as of November 8, 2021. The information set forth herein (including **Exhibit A**) is based upon information provided to the undersigned counsel (“Counsel”) by the members of the QTCB Noteholder Group and is intended only to comply with Bankruptcy Rule 2019 and the Order.

12. As of the date of this Eleventh Supplemental Statement, Counsel represents only the QTCB Noteholder Group and does not represent or purport to represent any other entities

other than the QTCB Noteholder Group with respect to the Debtors' Title III cases. In addition, neither the QTCB Noteholder Group nor any member of the QTCB Noteholder Group (a) assumes any fiduciary or other duties to any other creditor or person and (b) does not purport to act, represent or speak on behalf of any other entities in connection with the Debtors' Title III cases.

13. Nothing contained in this Eleventh Supplemental Statement (including **Exhibit A** hereto) is intended to or should be construed as (a) a limitation upon, or waiver of any right to assert, file and/or amend its claims in accordance with applicable law and any orders entered in this or any other related Title III cases by any QTCB Noteholder Group member, its affiliates or any other entity, or (b) an admission with respect to any fact or legal theory.

14. Additional holders of QTCBs may become members of the QTCB Noteholder Group, and certain members of the QTCB Noteholder Group may cease to be members in the future. The QTCB Noteholder Group, through its Counsel, reserves the right to amend or supplement this Eleventh Supplemental Statement as necessary for that or any other reason in accordance with the requirements set forth in Bankruptcy Rule 2019 and the Order.

15. The undersigned verify that the foregoing is true and correct to the best of their knowledge.

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RESPECTFULLY SUBMITTED,

Dated: November 9, 2021
San Juan, Puerto Rico

Morgan, Lewis & Bockius LLP

/s/ Kurt A. Mayr

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EXHIBIT A

**Names, Addresses and Disclosable Economic
Interests of the Members of the QTCB Noteholder Group¹**

¹ To the best of Counsel's knowledge, the information included herein is accurate as of the disclosure dates indicated. The amounts set forth herein include only outstanding principal and do not include any other amounts that may be due and owing under the applicable debt documents and laws, including but not limited to any overdue or compounded interest. In addition, the amounts set forth herein do not include any disclosable economic interests in the Debtors that were subject to pending trades or other transfers that had not settled or otherwise been closed as of the applicable disclosure date.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 9, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notifications of such filing to all attorneys of record.

**CORREA ACEVEDO & ABESADA
LAW OFFICES, P.S.C.**

/s/ Sergio Criado

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